

HINA SHAMSI
DIRECTOR
NATIONAL SECURITY PROJECT



September 28, 2015

VIA ECF

Hon. James Orenstein
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Raza v. City of New York*, 13 Civ. 3448 (PKC) (JO)

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
NATIONAL OFFICE
125 BROAD STREET, 18TH FL.
NEW YORK, NY 10004-2400
T/212.549.2500
WWW.ACLU.ORG

OFFICERS AND DIRECTORS
SUSAN N. HERMAN
PRESIDENT

ANTHONY D. ROMERO
EXECUTIVE DIRECTOR

Dear Judge Orenstein,

Pursuant to this Court's August 31, 2015 order, Plaintiffs write on behalf of both parties in this matter to provide a status report concerning the parties' settlement efforts, and to request an extension of the existing stay until November 2, 2015.

As you know, the parties have reached a settlement in principle, which is contingent on the resolution of a few additional details. Since the parties' last status letter to the Court, they have exchanged proposals for the resolution of those details, and continued their efforts to reach agreement and finalize them. Both parties anticipate being able to resolve these discrete items, and respectfully request that the stay in this matter be extended to November 2, 2015.

We appreciate the Court's attention to this matter.

Respectfully submitted,

Hina Shamsi
Counsel for Plaintiffs

Cc: The Honorable Pamela K. Chen (via ECF)
Defendants' counsel (via ECF)